

**SEALED**

**AFFIDAVIT**

I, Terrance L. Taylor, being duly sworn, do hereby depose and state the following:

**INTRODUCTION**

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I have been so employed with HSI since March 2012. I am currently assigned to the Office of the Resident Agent in Charge HSI Charleston, West Virginia (WV). Since this time, I have gained experience in conducting investigations involving computers and the procedures that are necessary to retrieve, collect, and preserve electronic evidence. Through my training and experience, including on-the-job discussions with other law enforcement agents and cooperating suspects, I am familiar with the operational techniques and organizational structure of child pornography distribution networks and child pornography possessors and their use of computers and other media devices.

2. I am a Special Agent with nineteen years of federal law enforcement experience. Prior to my employment with HSI, I was a Police Officer for two years in Huntington, WV, a Special Agent with the United States Department of State-Bureau of Diplomatic

Security for six years, a Special Agent with the Naval Criminal Investigative Service for two years, and a Special Agent with the United States Department of State-Office of Inspector General for two years. I am a graduate of three federal law enforcement academies at the Federal Law Enforcement Training Center ("FLETC") and a graduate of the West Virginia State Police Academy. I graduated from the Criminal Investigator Training Program in 2002, and the Immigration and Customs Enforcement Special Agent Training Program in 2012. As part of these programs, I received extensive training in the areas of law within the jurisdiction of HSI. These areas include laws and regulations pertaining to the importation of various types of merchandise and contraband, prohibited items, money laundering, and various immigration violations. I have more specifically received training in the areas of child pornography and the sexual exploitation and abuse of children. This training includes specialized instruction on how to conduct criminal investigations related to violations of child protection laws pursuant to Title 18, United States Code, Sections 2251, 2252, 2252A, 2256 and 2422.

3. As a Special Agent, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training at the FLETC, Immigration and Customs

Enforcement, as well as everyday work relating to investigations involving the receipt, possession, access with intent to view, production, importation, advertising, and distribution of child pornography that occur in the Southern District of West Virginia. I have received training in the areas of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. I have obtained search warrants for child pornography offenses, and I have been the case agent or assisted others in numerous investigations involving the sexual exploitation of children. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252A(a)(2) (receipt or distribution of child pornography), 2252A(a)(5)(B) (possession of child pornography), and 2422(b) (enticement of minors), and I am authorized by law to request a search warrant..

4. I make this affidavit in support of an application for a criminal complaint against TODD CHRISTOPHER ROATSEY, age 42, charging him with a violation of 18 U.S.C. § 2252A(a)(5)(B). That statute makes it illegal for any person to knowingly possess material containing images and videos of child pornography, as defined in 18 U.S.C. § 2256(8)(A) and which had been shipped and

transported in and affecting interstate and foreign commerce by any means, including by computer.

5. The information contained in this affidavit is based on information I gathered myself in the investigation and information I obtained from other law enforcement officers involved in this investigation.

6. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have attempted to summarize the most relevant facts that establish the requisite probable cause. Therefore, I have not included each and every fact of this investigation.

**PROBABLE CAUSE**

7. On or about August 22, 2021, MediaLab/Kik submitted CyberTip Report 98779073 to the NCMEC CyberTipline. The CyberTip Report was the result of MediaLab/Kik representatives reporting to NCMEC that a Kik profile bearing the username "jsparrow2174" had uploaded eight (8) videos and one (1) image through Kik Messenger. Kik representatives viewed the aforementioned files and found them to contain depictions of prepubescent and pubescent minors engaged in sexual activity. Kik representatives advised the aforementioned files were sent from "jsparrow2174."

8. In Cybertip Report 98779073, MediaLab/Kik reported the following information regarding Kik user "jsparrow2174" uploading

eight videos and one image of apparent child pornography between on or about July 13, 2021, and on or about July 16, 2021:

Email Address: ultimatew31@gmail.com

Screen/User Name: jsparrow2174

IP Address: 47.220.40.206 on 08-19-2021 at 21:35:46 UTC

NCMEC Geo-Lookup: Elkview, WV, Suddenlink Communications

9. On or about September 22, 2021, I reviewed the following video files associated to CyberTip 98779073 and found those to depict the following:

- a. Alphanumeric file 86241aa7-cb32-466f-8f87-cb4f259e72a3.mp4 was uploaded on July 13, 2021, at 23:40:35 UTC from IP address 47.220.40.206 associated to Suddenlink Communications. The 50-second video depicts a nude, prepubescent female with white skin, approximately 9-12 years old. The prepubescent female is lying on her back with her knees pulled up while an adult, white male penetrates her anus with his erect penis.
- b. Alphanumeric file 7547bd98-4068-4359-acdd-d2047e110ca3.mp4 was uploaded July 13, 2021, at 23:43:39 UTC from IP address 47.220.40.206 associated to Suddenlink Communications. The 1 minute, 41 second video depicts a nude, prepubescent female approximately 9-12 years old. The nude, prepubescent white female with brown hair is on her hands and knees while an adult, white male penetrates her vagina with his erect penis from behind.
- c. Alphanumeric file e6b04eba-9d47-4263-963b-72323b708aff.mp4 was uploaded on July 16, 2021, at 04:37:30 UTC from IP address 47.220.40.206 associated to Suddenlink Communications. The 49-second video depicts a nude, prepubescent female with white skin and blonde hair taking a video of

herself. The nude, prepubescent female penetrates her anus with a "sharpie" marker. The female also digitally penetrates her vagina with her fingers.

10. On or about September 16, 2021, HSI Charleston issued an administrative subpoena/summons to Suddenlink Communications regarding subscriber information pertaining to IP address 47.220.40.206 on July 13, 2021, through July 16, 2021. A review of the results obtained on October 18, 2021, identified the subscriber as Terry Roatsey, located at a residence in Elkview, Kanawha County, West Virginia, and the account had an activation date of April 20, 2005. According to publicly available records, Terry Roatsey, approximately age 73, is believed to be the father of Todd Christopher ROATSEY, approximately age 42; furthermore, Terry Roatsey owned the residence in Elkview prior to Todd ROATSEY purchasing the residence from him on April 5, 2007.

11. Publicly available database checks revealed that Terry Roatsey and Todd ROATSEY both appear to reside at the Elkview residence.

12. On October 27, 2021, a federal search warrant was obtained to search the Elkview residence belonging to Todd ROATSEY. The search warrant was executed on October 28, 2021. During the execution of the search warrant, numerous electronic devices were seized. Among the items seized was a Samsung tablet consistent with the device that had uploaded the images in the Kik Cybertip.

This tablet was found to have been reset to factory settings or otherwise had its contents removed during the week prior to the execution of the search warrant. However, law enforcement was able to determine from a forensic review of the device that the Kik application had previously been present on the device.

13. Terry Roatsey and Todd ROATSEY were both present at the residence when the search warrant was executed. Law enforcement was advised by them that they rented a room in the residence through AirBNB and indicated that as a result there had been numerous guests present during the preceding months. They indicated that these guests were provided with access to their wireless network.

14. A search of the media card removed from the phone seized from the person of Todd ROATSEY located numerous conversations from a messaging application. Several of these conversations appeared to be with girls in the age range of late elementary school through middle school.

15. A preliminary forensic review of a hard drive removed from an Acer Aspire laptop that was seized from the residence also revealed approximately 26 images and 7 videos of child pornography. On October 29, 2021, I reviewed some of the image files located on the computer and found those to depict the following:

- a. MD5 Hash 34a9affa263452dc7c9a1d7a3315dbb8 depicts a nude, prepubescent female with brown skin and dark hair, approximately 5-7 years old. An adult male's erect penis is inserted in the girl's mouth.
- b. MD5 Hash c828756ece13fc08c35786a0832a8ac depicts a partially nude, prepubescent female with white skin, approximately 5-7 years old. The prepubescent female is wearing a white shirt with pink hearts; she is nude below the waist and her vagina is exposed. An adult male is placing his penis on the prepubescent female's vagina.

16. The forensic review of the Acer laptop hard drive also located several files and email addresses within the system attributed to Todd ROATSEY. The computer also had numerous anti-forensic programs, including Shredder, Eraser, DeleteFilesPermanently, and Free Internet Eraser.

17. In addition to the evidence from Kik regarding the use of internet to upload child pornography, evidence from the computer indicated that defendant used the internet to visit websites known by law enforcement to be associated with child pornography.

#### CONCLUSION

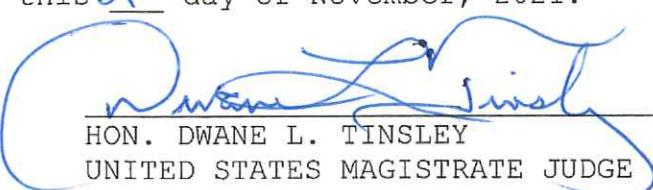
18. Based upon the information provided above, your affiant alleges that there exists probable cause to believe that TODD CHRISTOPHER ROATSEY knowingly violated 18 U.S.C. § 2252A(a)(5)(B) in that on October 28, 2021, he knowingly possessed images and videos at his residence in Elkview, Kanawha County, West Virginia, depicting child pornography that involved prepubescent minors and

that had been shipped and transported in interstate or foreign commerce.

Further your Affiant sayeth naught.

  
SPECIAL AGENT TERRANCE L. TAYLOR  
DEPARTMENT OF HOMELAND SECURITY  
HOMELAND SECURITY INVESTIGATIONS

Sworn to by the Affiant telephonically in accordance with the procedures of Rule 4.1 this 2nd day of November, 2021.

  
HON. DWANE L. TINSLEY  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF WEST VIRGINIA